



These 3 parties hereby submit, for inclusion in FCC Docket RM-11287 the following

statement, which is made by WILLIAM C. WALKER, General Manager and Proprietor of

WILW RADIO, *but also* endorsed by SCOTT TODD and RAND ADVERTISING:

-2-

“1.) William C. Walker requests that a COMMERCIAL ONLY Licensed LPAM service be created.

“Small, independent business owners need an affordable means to advertise their products to their customers, especially in the inner cities and rural areas. Many elderly and handicapped residents cannot drive or take a bus to a distant shopping center in another part of the city or a suburb. Many have to walk to the corner store to purchase their basic necessities of life.

“These businesses don’t have the revenue to purchase advertising at \$50 a spot on the big licensed stations. This, in turn, makes it more difficult for these small businesses to attract new customers or offer prices that can compete with the bigger chains.

“Volume sales brings down prices. Mom and Pop stores will be able to reduce prices and pass these savings along to their consumers if they have a chance to grow sales by purchasing affordable advertising on the radio.

“2.) Non commercial LPAM will result in literal fiscal suicide for small independent non profit groups. If non commercial AM was a viable service, we’d see just as many non commercial AM stations as non commercial FM stations. Clearly, the only non commercial AM stations that can survive are those that have ties to NPR or State-run radio, or larger educational institutions and religious organizations with deep pockets.

“FM radio has demonstrated it can support non commercial FM broadcasting, even on the smallest scale. To date, however, there doesn’t appear to be any successful small, licensed non commercial AM outlets anywhere in the nation, at least according to my research.

“3a.) Commercial ONLY LPAM will allow new entrants into the playing field of legal, licensed broadcasting. Many of these people presently run commercial, non profit or

hobby part 15 AM broadcast stations. Now, these entrepreneurs will have an opportunity to own a broadcast outlet that will have a positive impact on the neighborhoods, cities and rural areas they intend to serve. Selling air time to local groups (Block programming) will help raise revenue -- and allow "niche markets" to meet the program needs of their respective constituencies for at least a few hours a day or week.

"b.) LPFM, in its present form, has enabled many new religious groups and non profit groups to obtain a licensed station. Now, in a spirit of fair play, plus a recognition to serve the needs of our small rural towns and inner city neighborhoods, a commercial only Low Power Radio Service deserves a home on the AM Band. Commercial only LPAM can best serve the AM broadcast band and its listeners.

"c.) FM attracts a different demographic of listeners than AM. The proponents of non commercial LPAM view the AM dial as merely an extension of the FM dial, and will attempt to provide FM programming on the AM dial.

-3-

"This is another recipe for failure and this attempt to homogenize the AM dial, in the manner of the FM dial, will bankrupt virtually EVERY non profit group foolish enough to attempt it. Please do not treat the AM dial like the FM dial.

"d.) There are countless examples of small commercial AM stations being able to survive in small markets and rural areas when they offer local programming in place of syndicated, satellite fed programs. LPAM can be an extension of this, albeit on a smaller scale, without the high risk of mega corporate acquisitions through mandatory license auctions. LPAM can make it possible, *once again*, for small, locally focused commercial stations to compete successfully against larger stations in or near their markets.

"e.) These small commercial LPAM outlets will be able to provide much needed new services to many of these radio markets. They can provide local coverage of public affairs, live local "call in" talk programming, local sports, local news, local weather, local emergency information when stations are working with local emergency personnel, community calendar, swap shop, notices about lost (or found) pets and much, much more. Commercial LPAM stations can also become training grounds for new On Air talent that otherwise cannot break into a bigger licensed station, perhaps at a college, because they don't know the "right" people.

"4.) IBOC is clearly a disaster in the making for licensed AM broadcasting. I personally have heard, first hand, of the damage that is done to 2<sup>nd</sup> and even 3<sup>rd</sup> adjacent channels during the day on stations running IBOC. AM 950 in Detroit and

AM 850 in St. Louis are two such examples of disruptive AM IBOC transmissions: the IBOC hash from these stations wipes out 2<sup>nd</sup> adjacent channels up to at least 30 miles away from their transmitters. First adjacent channels up to 100 miles are negatively affected!

“When WSAI AM 1530 was testing its IBOC signal at night, the signal obliterated WWKB AM 1520 in Buffalo -- on the backside of its directional signal (west side) -- until you were only 15 miles from the towers. Previously, I could get a listenable signal for WWKB AM 1520 at about 30 miles on its West side. IBOC at night cut WWKB AM1520’s range to the west in HALF!

“I urge the FCC to carefully reconsider its support of IBOC and instead consider Leonard Khan’s plan for HD Radio. Better still, scrap the plan to digitalize AM altogether and leave it as an “analog only” service. Program content with decent audio quality will attract more listeners than marginal program quality with HD quality sound.

“IBOC will do more than destroy the full power licensed AM broadcasters. It will also prevent licensed LPAM from gaining any meaningful range from their transmitters.

“5.) I, William C. Walker of WILW RADIO, also ask that consideration be given to the following technical requirements for the proposed licensed LPAM service:

-4-

“a.) Establish a 100 watt and 30 watt Primary Service, supplemented by a 10 watt Secondary Service. No power levels below 10 watts should be considered.

“b.) Use existing channel spacing rules for stations in the AM Expanded Band. This means that if a station can meet the 10 kw by day and 1 kw by night spacing requirements, it should be licensed to that frequency. This approach allows room for growth and expansion -- and will reduce the potential for serious skywave issues to occur. It will also leave room for part 15 AM broadcasters to continue their hobbies and/or businesses.

“c.) Consider only frequencies between 1620 and 1700 for licensed LPAM operations.

“d.) Limit antenna heights to a maximum of 40 feet, as provided in the Baumgartner Petition. Antenna heights should be permitted at heights under 40 feet in order to expedite a station application, should local zoning become an issue with heights approaching 40 feet.

“e.) Utilize the authorized power levels in full, for both day time and night time service.

“f.) Permit stereo operation, if a station owner chooses to use a stereo generator.

“6.) Lastly, I urge the FCC, in addition to permitting COMMERCIAL operation of a licensed LPAM station, to allow the owner of each LPAM station to decide what programming best serves its community of license. While some mandates asking for public affairs programming should be put in place, please bear in mind that each community is different and one particular type of informational programming may work in one city but flop in another. It should be up to the discretion of each individual owner to determine what works best to service his or her particular market.”

To avoid possible confusion, the Commission should be aware that the proposals by WILW

RADIO, endorsed by the other 2 parties to these Comments, do *not* “track” every proposal in

the 5-party LPAM Petition of August 19.

Some of the proposals outlined above address issues -- such as whether LPAM stations should be

limited to the Expanded Band -- on which the 5-party LPAM Petition of August 19 is silent.

In addition:

With respect to the specific issues of channel spacing requirements and proposed wattage ceilings

for LPAM stations, the proposals by WILW RADIO, endorsed by SCOTT TODD and RAND

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in the Appendix of the August 19 LPAM Petition.

Specifically:

The August 19 document, prepared by THE LPAM NETWORK, proposes a nationally uniform

power ceiling for all LPAM stations, in all locations, of 100 watts. However, the present

proposals of November 17, advanced in these Written Comments by WILW RADIO and 2 other

parties, envision a 3-tiered system -- with 100 watt and 30 watt stations, shielded by Primary

Service Status, and 10 watt stations that have Secondary Service Status.

In any event:

WILW RADIO of New York State, SCOTT TODD of Minnesota and RAND

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of Maine thank the Commission for investing its time and energy in consideration of a new, commercial LPAM radio service.

We look forward to working with you to achieve this goal in the years that lay ahead.

Respectfully submitted,

William C. Walker  
Proprietor and General Manager  
THE LPAM NETWORK

*And*

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